

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CATHERINE MCKOY, MILLARD WILLIAMS,  
MARKUS FRAZIERA, and LYNN CHADWICK,  
individually and on behalf of all  
others similarly situated,

*Plaintiffs,*

-against-

THE TRUMP CORPORATION, DONALD J.  
TRUMP, in his personal capacity,  
DONALD TRUMP JR., ERIC TRUMP, and  
IVANKA TRUMP,

*Defendants.*

Case No. 1:18-cv-09936 (LGS)

**DECLARATION OF  
JOANNA C. HENDON  
IN SUPPORT OF NOTICE  
OF WITHDRAWAL**

I, Joanna C. Hendon, declare and state as follows:

1. On January 14, 2019, I filed a Notice of Appearance (ECF No. 61) on behalf of all defendants in this matter (“Defendants”).
2. On August 5, 2021, Robert & Robert PLLC by Clifford S. Robert and Michael Farina appeared in this action as counsel of record for the Defendants “in the place of stead of their former counsel, Alston & Bird LLP, 90 Park Avenue, New York, NY 100165, by Joanna C. Hendon.” A copy of the Stipulation and [Proposed] Order Substituting Counsel and Permitting Withdrawal of Counsel (ECF No. 329) (the “Stipulation”) is annexed hereto as Exhibit 1.<sup>1</sup>
3. Clifford S. Robert and Michael Farina of Robert & Robert PLLC filed notices of appearance on August 5, 2021 (ECF Nos. 316-17) and have represented Defendants in this action since August 5, 2021.

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<sup>1</sup> The Stipulation was filed with the Court on September 10, 2021, and the application to withdraw was denied without prejudice to renewal (ECF No. 332).

4. Defendants also retained Peter T. Shapiro of Lewis Brisbois Bisgaard & Smith LLP, who filed a notice of appearance in this action on August 10, 2021 (ECF No. 318), and has represented Defendants in this action since August 10, 2021.

5. I have not represented Defendants since August 5, 2021, when Defendants engaged new counsel to represent them in this matter. Therefore, pursuant to Local Civil Rule 1.4, I respectfully request leave of the Court to withdraw my individual appearance as counsel for Defendants.

6. Defendants will continue to be represented by Clifford S. Robert and Michael Farina of Robert & Robert PLLC, and Peter T. Shapiro of Lewis Brisbois Bisgaard & Smith LLP.

7. This withdrawal will not affect this action in any way, including the posture of the case and the calendar. Nor will this withdrawal prejudice the Plaintiffs.

8. Neither I nor Alson & Bird LLP are asserting a charging or retaining lien against any of the Defendants.

9. I am causing this motion, including all of the papers submitted with the motion, to be served on Defendants and all parties.

Dated: New York, New York  
May 4, 2022

By: /s/ Joanna C. Hendon  
Joanna C. Hendon